

FILED
HARRISBURG, PA

FEB 19 2025

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF PENNSYLVANIAPER 
DEPUTY CLERK

UNITED STATES OF AMERICA : No. 1:25-CR- 50

v. : (Judge Mannion)

NOEL CHINCHILLA-AVILEZ, :

Defendant. :

INDICTMENT

THE GRAND JURY CHARGES:

COUNT 1

8 U.S.C. § 1253(a)(1)(A)
(Failure to Depart)

From in or around February 2023, through on or about February 14, 2025, in York County, Pennsylvania, within the Middle District of Pennsylvania, and elsewhere, the defendant,

NOEL CHINCHILLA-AVILEZ,

being a deportable alien against whom a final order of removal was outstanding pursuant to Title 8, United States Code, Section 1227(a), did willfully fail and refuse to depart from the United States within a period of ninety (90) days from the date of the final order of removal under administrative processes.

In violation of Title 8, United States Code, Section 1253(a)(1)(A).

COUNT 2

8 U.S.C. § 1253(a)(1)(C)
(Hindering Removal)

On or about February 14, 2025, in York County, Pennsylvania,
within the Middle District of Pennsylvania, the defendant,


NOEL CHINCHILLA-AVILEZ,

an alien against whom a final order of removal is outstanding, by reason
of being a member of any of the classes described in 8 U.S.C. § 1227(a),
did connive, conspire, and take any other action, designed to prevent and
hamper and with the purpose of preventing and hampering his departure
from the United States.

In violation of Title 8, United States Code, Section 1253(a)(1)(C).


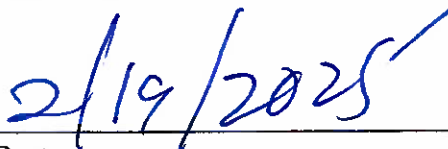
A TRUE BILL

JOHN C. GURGANUS
Acting United States Attorney



MICHAEL SCALERA
Assistant United States Attorney

FOREPERSON

Date